

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re: : Chapter 11  
: :  
MOTORS LIQUIDATION COMPANY, *et al.*, : Case No.: 09-50026 (REG)  
f/k/a General Motors Corp., *et al.* :  
: (Jointly Administered)  
Debtors. :  
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**STIPULATION AND AGREED SCHEDULING ORDER REGARDING  
THE NO STAY PLEADING FILED BY ALEJANDRO ALERS, SR.**

General Motors LLC (“**New GM**”) and Alejandro Alers, Sr. (“**Mr. Alers**,” and with New GM, the “**Parties**”) respectfully submit this Stipulation and Agreed Scheduling Order regarding the briefing schedule for the No Stay Pleading filed by Mr. Alers on October 6, 2014 [Dkt. 12937] (“**No Stay Pleading**”):

1. In connection with the No Stay Pleading, the Parties have agreed on the following briefing schedule:

Event	Agreed Date
No Stay Pleading Filed by Mr. Alers	October 7, 2014
New GM to File a Response (“ <b><u>Response</u></b> ”) to the No Stay Pleading	October 21, 2014
Hearing on No Stay Pleading	No Hearing is Necessary and the Court Shall Decide the Matter on the No Stay Pleading and the Response

2. This Stipulation is subject to approval by the Court. In the event the Court declines to approve this Stipulation, it shall be null and void, with no effect.

3. This Stipulation may be executed in counterparts, any of which may be transmitted by facsimile or e-mail transmission, and each of which shall be deemed an original.

4. The Parties each reserve the right to seek a continuance of any deadlines or dates set forth herein.

**SO AGREED TO BY AND AMONG THE FOLLOWING:**

/s/ Scott Davidson  
Arthur Steinberg  
Scott Davidson  
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*Attorneys for General Motors LLC*

DATED: 10/15/14

/s/ Alejandro Alers, Jr.  
Alejandro Alers, Jr.  
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310-672-0369  
  
*Attorney for Alejandro Alers, Sr.*

DATED: 10-14-14

**SO ORDERED:**

Dated: New York, New York  
October 16, 2014

s/ Robert E. Gerber  
United States Bankruptcy Judge